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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

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Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF FILING OF SUBROGATION
WILDFIRE TRUST AGREEMENT**

Related Dkt Nos. 5590, 5700, 5732

1 **PLEASE TAKE NOTICE** that, on February 7, 2020, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
3 captioned chapter 11 cases, filed the *[Proposed] Disclosure Statement for Debtors’ and Shareholder*
4 *Proponents’ Joint Chapter 11 Plan of Reorganization* [Dkt. No. 5700] (as it may be amended, modified
5 or supplemented, and together with any exhibits or schedules thereto, the “**Proposed Disclosure**
6 **Statement**”) for the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization*
7 *dated January 31, 2020* [Dkt. No. 5590] (as it may be amended, modified or supplemented, and together
8 with any exhibits or schedules thereto, the “**Plan**”).

9 **PLEASE TAKE FURTHER NOTICE** that, on February 11, 2020, the Bankruptcy Court
10 entered the *Amended Order Establishing Schedule for Disclosure Statement Approval and Plan*
11 *Confirmation* [Dkt. No. 5732] (the “**Amended Scheduling Order**”) setting, among other things,
12 deadlines for the filing of certain documents related to the Plan and Proposed Disclosure Statement.

13 **PLEASE TAKE FURTHER NOTICE** that, in accordance with the Amended Scheduling
14 Order, the Debtors hereby file the Subrogation Wildfire Trust Agreement, as defined in the Plan, attached
15 hereto as **Exhibit A**, which the Plan and Proposed Disclosure Statement contemplate will be included in
16 the Plan Supplement (as defined in the Plan).

17 Dated: February 28, 2020

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19 **WEIL, GOTSHAL & MANGES LLP**
20 **KELLER & BENVENUTTI LLP**

21 /s/ Thomas B. Rupp

22 Thomas B. Rupp

23 *Attorneys for Debtors and Debtors in Possession*
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